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12 *Attorneys for Defendants*  
13 *RIMINI STREET, INC. and SETH RAVIN*

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17 UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

18 ORACLE USA, INC., a Colorado corporation;  
19 ORACLE AMERICA, INC., a Delaware  
corporation; and ORACLE INTERNATIONAL  
20 CORPORATION, a California corporation,

21 Plaintiffs,

22 v.

23 RIMINI STREET, INC. , a Nevada corporation;  
24 SETH RAVIN, an individual,

25 Defendants.

Case No. 2:10-cv-0106-LRH-PAL

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28 **DECLARATION OF ROBERT H.  
RECKERS IN SUPPORT OF  
DEFENDANTS' OPPOSITION TO  
ORACLE'S MOTION FOR  
EVIDENTIARY SANCTIONS FOR  
SPOILATION**

Judge: Hon. Larry R. Hicks

## DECLARATION OF ROBERT H. RECKERS

I, Robert H. Reckers, have personal knowledge of the facts stated below and, under penalty of perjury, hereby declare:

1. I am an attorney admitted to practice *pro hac vice* before this Court in the above captioned matter, and an attorney at Shook, Hardy, and Bacon LLP, attorneys for Defendants Rimini Street, Inc. and Seth Ravin, (“Defendants”). I make this declaration in support of Defendants’ Opposition to Oracle’s Motion for Evidentiary Sanctions for Spoliation filed on June 18, 2012. The Exhibits referenced below are all attached to this Declaration.

2. These Exhibits are all true and correct copies of page and excerpts from final deposition transcripts, or from exhibits used in depositions, or from documents produced by the parties or a third party, or from written discovery exchanged between the parties. To minimize bulk, for ease of use, and to the extent possible without losing context, only the relevant pages and information are included in these Exhibits.

3. Attached to the Appendix as **Exhibit 1** is a true and accurate copy of a document produced by Rimini to Oracle as part of discovery in this action. The document bears Bates numbers RSI04807259-61. This document was designated Confidential Information by Defendants pursuant to the Protective Order.

4. Attached to the Appendix as **Exhibit 2** is a true and accurate copy of relevant excerpts of the transcript of the December 16, 2011 deposition of Brian Slepko. The excerpted sections were designated Confidential by Defendants pursuant to the Protective Order.

5. Attached to the Appendix as **Exhibit 3** is a true and accurate copy of relevant excerpts of the transcript of the November 11, 2011 deposition of George Lester. The excerpted sections were designated Confidential by Defendants pursuant to the Protective Order.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

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2 Executed on June 18, 2012  
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/s/ Robert H. Reckers  
Robert H. Reckers, Esq.

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